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Alabama Department of
Public Safety

DEPT. OF TRANSPORTATION
PRIVATE

REPLY MAY BE MADE TO:

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September 11, 2001

U.S. Department of Transportation
Dockets Management Facility
Room PL 401
400 Seventh Street, SW
Washington, D.C. 20590

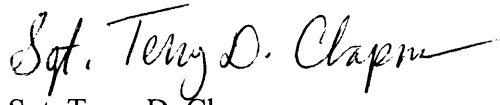
Questions posed on insulin-using diabetic drivers test study for FMCSA: (Docket No. FMCSA-2001-9800) - 32

I am writing this letter in response to your decision to allow insulin-treated diabetes mellitus (ITDM) drivers to obtain a commercial driver license (CDL). The state of Alabama has adopted federal standards and does not allow ITDM individuals to obtain a CDL. Drivers who were already driving intrastate were given grandfather rights, but no new drivers are allowed to obtain a CDL. Federal standards require an individual to have operated a commercial motor vehicle (CMV) with a diabetic condition controlled by the use of insulin for the three-year period immediately preceding application. It also states that the applicant must possess a valid intrastate CDL. When individuals that have never obtained a CDL apply for an exemption, they are advised to contact their home state and obtain an intrastate only CDL to gain their three years of experience. These individuals follow these instructions and contact the state of Alabama and ask for an intrastate waiver. Since the state of Alabama does not issue intrastate waivers for ITDM drivers, they are denied a license. This causes frustration on the part of the driver and Alabama Department of Public Safety employees. The Federal Motor Carrier Safety Administration (FMCSA) should not provide erroneous information to applicants from Alabama that are seeking ITDM exemptions. The FMCSA needs to provide a method for applicants to qualify for these exemptions from states that do not issue intrastate waivers.

One of the components for these exemptions is the monitoring of ITDM commercial drivers. Who would be required to perform this monitoring? Would it be the employer? Would it be the state? If it were left up to the state, would federal monies be available to offset the costs of this monitoring? Would federal monies be available to offset programming, suspension, reinstatement, and other associated costs?

This notice states that the FMCSA estimates that approximately 200 applications for exemption could be filed annually. I would estimate that you would receive that many applications the first week or two. The number of applications received will be many times greater than 200 per year. Is the FMCSA prepared for a greater number of applications?

Sincerely,

A handwritten signature in black ink that reads "Sgt. Terry D. Chapman". The signature is written in a cursive style with a long horizontal flourish at the end.

Sgt. Terry D. Chapman
CDL Coordinator/ Medical Supervisor
Alabama Department of Public Safety